

IN THE COURT OF APPEALS  
FOR THE SECOND COURT OF APPEALS DISTRICT  
FORT WORTH, TEXAS

EX PARTE

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FILED IN  
2nd COURT OF APPEALS  
FORT WORTH, TEXAS  
10/24/2019 1:37:52 PM  
DEBRA SPISAK  
Clerk

NO: 02-19-00064-CR

SULIA LAWRENCE BROWN

UNOPPOSED MOTION TO PUBLISH OPINION TEX. R. APP. P 47.2(B)

TO THE HONORABLE JUDGES OF SAID COURT:

COMES NOW SULIA BROWN, hereinafter referred to as Appellant, by and through his attorney of record, WES BALL and files his Motion to Publish Opinion pursuant to Tex. R. App. P. 47.2(b) and in support thereof would show the Court as follows:

I.

This Honorable Court issued its opinion on October 17, 2019 reversing the decision of the trial Court on an Application for Writ of Habeas Corpus. The factual background of the case was one of first impression and involved an assortment of statutes from the family code, code of criminal procedure, human resources code and Texas Constitution. The case presented a unique set of facts that required application of the referenced statutes.

The bench and bar would benefit from a decision to publish this opinion as there is little other precedent on the issues in this case, should a similar fact pattern

appear before the appellate courts of this state. Texas Rule of Appellate Procedure 47.2(b) authorizes a party to move this Court to change the notation from “do not publish” to “publish.” There has been no petition for discretionary review filed or acted upon by the Court of Criminal Appeals which would prevent this change.

WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Honorable Court change the notation from “do not publish” to “publish.”

Respectfully submitted,

/s/ Wes Ball

WES BALL

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ATTORNEY FOR APPELLANT

### **CERTIFICATE OF SERVICE**

On this the 24<sup>th</sup> day of October, 2019, a true and correct copy of the above and foregoing Motion was delivered electronically to Andrea Jacobs, Tarrant County Assistant District Attorney, Post-Conviction Division.

/s/ Wes Ball

WES BALL

**CERTIFICATE OF CONFERENCE**

On the 24<sup>th</sup> day of October, 2019, Appellant's counsel, Wes Ball, conferenced with Andrea Jacobs, Tarrant County Assistant District Attorney, Post-Conviction Division, regarding the foregoing Motion and has been advised that the state does not oppose the Motion.

/s/ Wes Ball  
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WES BALL